

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

NFS LEASING, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:23-cv-00203
	)	
SA HOSPITAL ACQUISITION GROUP, LLC,	)	
et al.,	)	
	)	
Defendant.	)	

**RECEIVER FOR SA HOSPITAL ACQUISITION GROUP LLC’S**  
**MOTION TO TEMPORARILY STAY PROCEEDINGS**

MorrisAnderson & Associates, Ltd. (“Receiver”), in its capacity as state court appointed general receiver for Defendant SA Hospital Acquisition Group, LLC (“SA Hospital”), respectfully requests that the above-captioned proceedings be stayed for a period up to and including September 12, 2023, in recognition of and consistent with the *Order for Appointment of Receiver* (the “Receivership Order”) entered by the Circuit Court of St. Louis City, Missouri on May 25, 2023 (Case No. 2322-CC00960), so as to permit the Receivership over SA Hospital to move forward consistent with the Receivership Order. Pursuant to Mo. Rev. Stat. 515.575.2, the Receivership Order automatically stays litigants from proceeding with pending litigation against SA Hospital for 60 days after appointment of a receiver. *See* RSMo. § 515.575.2. The Receivership Order found good cause to extend this stay and ordered the stay extended to 120 days after the date that the receivership action was filed (May 15, 2023), which would stay parties, including NFS Leasing, Inc., from continuing with an action or proceeding against SA Hospital. See Receivership Order, ¶ 27.

Here, a stay is necessary in order to effect the purpose of the Missouri receivership statute and to permit the orderly administration of the receivership in accordance with Missouri law, including to keep, preserve and protect the business, business interests and property of SA Hospital for the benefit of SA Hospital's creditors.

WHEREFORE, for the foregoing reasons and those set forth in the accompanying memorandum of law filed simultaneously herewith, SA Hospital respectfully requests that this Court enter a temporary stay of the proceedings in the above-captioned cause of action, for a period up to and including September 12, 2023, and for all other relief as the Court deems necessary and just.

Dated: June 14, 2023

Respectfully submitted,

THOMPSON COBURN LLP

By /s/ Brian Hockett

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Associates, Ltd., as Receiver for  
SA Hospital Acquisition Group, LLC

**Certificate of Service**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing document has been filed electronically and is available for viewing and downloading from the ECF system. The foregoing document has been served upon All Counsel of Record via ECF and/or E-mail, on this 14th day of June, 2023.

/s/ Brian Hockett